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Attorneys for Defendant
SYDNEY DICKERSON

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAI‘I**

JANE DOE, Individually and as Next Friend of JOHN DOE, a minor;
RICHARD ROE 1, Individually and on behalf of JANE ROE 1, a minor;
RICHARD ROE 2 and MRS.
RICHARD ROE 2, Individually and on behalf of JANE ROE 2, a minor;
all Individually and on behalf of a class of persons similarly situated,

Plaintiffs,
vs.

STATE OF HAWAII, SCOTT O’NEAL, SYDNEY DICKERSON, and JOHN DOES 1-10,

Defendants.

STATE OF HAWAII

Third-Party Plaintiff,
vs.

CIVIL NO. 11-00550 DAE KSC
(Other Non-Vehicle Tort)

**INITIAL DISCLOSURES OF
SYDNEY DICKERSON
IN HER PERSONAL CAPACITY;
CERTIFICATE OF SERVICE**

Trial Date: 10/23/2012 @ 9:00 am

PETER POES 1-100, PATRICIA
POES 1-100, AND PARENT POES
1-100,

Third-Party Defendants.

SCOTT O'NEAL,

Cross-Claimant,
vs.

STATE OF HAWAI'I AND
SYDNEY DICKERSON,
Cross Claim Defendants.

**INITIAL DISCLOSURES OF SYDNEY DICKERSON
IN HER PERSONAL CAPACITY**

SYDNEY DICKERSON, in her individual capacity (hereinafter Ms. Dickerson), by her attorneys, David M. Louie, Attorney General of Hawaii, Deborah Day Emerson, C. Bryan Fitzgerald, Deputy Attorneys General, pursuant to Rule 26(a)(1), Federal Rules of Civil Procedure, hereby submit Initial Disclosures.

I. PERSONS WITH PERSONAL KNOWLEDGE

Ms. Dickerson identifies the following persons who may have knowledge of discoverable information on liability and/or damages that may be used by the parties in support of their claims or defenses. Some of the information held by such persons may be privileged, which will have to be determined through further investigations and discovery.

1. All other parties to this action, including DOES, ROES, POES and their parents and/or guardians as is applicable.

Contact through their respective counsel of record.

2. Harry Hayler

c/o Department of the Attorney General
425 Queen Street
Honolulu, Hawaii 96813
Telephone: 586-1300

3. Inga Park-Okuna

c/o Department of the Attorney General
425 Queen Street
Honolulu, Hawaii 96813
Telephone: 586-1300

4. Danielle Thompson

c/o Department of the Attorney General
425 Queen Street
Honolulu, Hawaii 96813
Telephone: 586-1300

5. Steve Laracuente

c/o Department of the Attorney General
425 Queen Street
Honolulu, Hawaii 96813
Telephone: 586-1300

6. Patricia Hamamoto

c/o Department of the Attorney General
425 Queen Street
Honolulu, Hawaii 96813
Telephone: 586-1300

7. Persons identified only as "RINGLEADERS" by the Plaintiff.

c/o MICHAEL JAY GREEN
841 Bishop Street, Suite 2201
Honolulu, Hawaii 96813
Telephone: (808) 521-3336
Fax: (808) 566-0347

8. All individuals listed in any other parties' initial disclosures.
9. Ms. Dickerson reserve the right to supplement/amend its Initial Disclosures as deemed necessary, based upon further investigation and discovery.
10. Ms. Dickerson reserves the right to identify other persons who may have knowledge of discoverable information relevant to the claims and the defenses.

II. DOCUMENTS, DATA COMPILATIONS, TANGIBLE THINGS

Pursuant to Rule 26(a)(1)(B), Ms. Dickerson will provide access to documents, including the following description by category of documents and tangible things, to the extent not privileged, to Plaintiffs' counsel for inspection and/or copying at a mutually convenient time and place. Currently, there are no documents, data compilations or tangible things in the possession, custody or control of Ms. Dickerson, individually, that may be used to support his defenses in this case.

III. DAMAGES

At this time, the Ms. Dickerson has yet to cross or counter claim in this matter.

IV. INSURANCE

Ms. Dickerson is unaware of any insurance coverage other than that which may be available by way of the potential vicarious liability of the State.

DATED: Honolulu, Hawai‘i, November 14, 2011.

DAVID M. LOUIE
Attorney General of Hawai‘i

/s/ C. Bryan Fitzgerald
C. BRYAN FITZGERALD
Deputy Attorney General

Attorneys for Defendant
SYDNEY DICKERSON,
In Her Individual Capacity

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAI'I**

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Plaintiffs,
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Defendants.

STATE OF HAWAII

Third-Party Plaintiff,
vs.

PETER POES 1-100, PATRICIA POES 1-100, AND PARENT POES 1-100,

Third-Party Defendants.

SCOTT O'NEAL,

Cross-Claimant,
vs.

STATE OF HAWAI'I AND SYDNEY DICKERSON, Cross Claim Defendants.

CIVIL NO. 11-00550 DAE KSC
(Other Non-Vehicle Tort)

**CERTIFICATE OF SERVICE
(INITIAL DISCLOSURES OF
SYDNEY DICKERSON IN HER
PERSONAL CAPACITY)**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the undersigned date a copy of the above stated motion was served by first-class United States mail or electronically via CM/ECF, to the following parties at their last known address:

MICHAEL J. GREEN, Esq.
Davies Pacific Ctr.
841 Bishop St., Ste. 2201
Honolulu, Hawaii 96813
Attorney for Plaintiffs

JOHN MOLAY
Deputy Attorneys General
Department of the Attorney
General, State of Hawaii
425 Queen Street
Honolulu, Hawaii 96813
Attorneys for Defendant STATE OF HAWAII

RANDALL K. SCHMITT, Esq.
JORDON J. KIMURA, Esq.
500 Ala Moana Boulevard
Five Waterfront Plaza, 4th Floor
Honolulu, Hawai'i 96813
Attorneys for Defendant Scott O'Neal

DATED: Honolulu, Hawai'i, November 14, 2011.

/s/ C. Bryan Fitzgerald
C. BRYAN FITZGERALD
Deputy Attorney General